REMARKS/ARGUMENTS

The amended listing of claims and the following arguments are presented generally to impart precision to the claims, by particularly pointing out and distinctly claiming the subject matter, rather than to avoid prior art. The pending claims are supported by the specification. No new matter is added.

Applicant respectfully submits that the currently pending claims are patentable over the cited references.

35 U.S.C. §102(b) Rejections

Examiner rejected claims 1-39 under 35 U.S.C. §102(b) as being anticipated by Robinson et al., "New Approach to Creating and Testing Internationalized Software", November, 1998, (hereinafter "Robinson"). Applicant respectfully submits that pending claims are patentable over Robinson, since Robinson does not show each and every aspect of the pending claims.

For example, claim 29 recites:

- 29. (Original) A system, comprising:
 - a computer system having a processor, a memory, and an input/output device:
 - an executable build application, stored in the memory of the computer system, and configured, when executed by the processor, to generate a language-specific build; and
 - at least one executable pseudo localization utility application, stored in the memory of the computer system, and integrated with the build application to generate a pseudo-language, language-specific build, the at least one executable pseudo localization utility application configured, when executed by the processor,

to retrieve locale-dependant code from at least one storage location, to alter an appearance of the locale-dependant code, and to store the altered locale-dependant code in at least one second storage location.

Robinson (page 32) describes **solution 1** "to construct artificial message strings that mimic the kind of problems we see in real translated message strings". For example, "using a freeware Internet Utility called the Encheferizer, we append long nonsense strings onto each English string" (page 32, left column, Robinson), and "to simulate double-byte characters such as those use in Japanese, we used a small program that maps ASCII characters into a double-byte format" (page 32, right column, Robinson). However, Robinson does not show how the programs to "construct artificial message strings", such as Encheferizer, are arranged with respect to the build application. Particularly, Robinson does not show "at least one executable *pseudo localization utility application*, stored in the memory of the computer system, and *integrated with the build application* to generate a pseudo-language, language-specific build".

Thus, claim 29 and its dependent claims are patentable over Robinson at least for the above reasons.

For example, claim 15 recites:

15. (Currently Amended) An article of manufacture, comprising:

a machine-readable medium including instructions stored thereon,

which, when executed by a machine, cause the machine to:

implement a pseudo localization process integrated with a build

process, wherein the pseudo localization process includes at

least one pseudo localization utility application;

execute the at least one pseudo localization utility application to

generate pseudo-translated locale-dependant code through:

- (a) retrieving locale-dependant code from at least one storage location;
- (b) altering an appearance of the locale-dependant code; and
- (c) storing the altered locale-dependant code in at least one second storage location; and

generate a pseudo-language build with the pseudo-translated localedependant code.

Robinson does not show how the programs to "construct artificial message strings", such as Encheferizer, are arranged with respect to the build application. Particularly, Robinson does not show "a machine-readable medium including instructions stored thereon, which, when executed by a machine, cause the machine to: implement a pseudo localization process integrated with a build process".

Thus, claim 15 and its dependent claims are patentable over Robinson at least for the above reasons.

For example, claim 1 recites:

- 1. (Original) A method, comprising:
 - integrating a pseudo localization process with a build process, wherein the pseudo localization process includes at least one pseudo localization utility application;
 - executing the at least one pseudo localization utility application to generate pseudo-translated locale-dependant code, wherein executing the at least one pseudo localization utility application includes:
 - (a) retrieving locale-dependant code from at least one storage location;
 - (b) altering an appearance of the locale-dependant code; and
 - (c) storing the altered locale-dependant code in at least one second storage location; and

generating a pseudo-language build with the pseudo-translated localedependant code.

Robinson does not show how the programs to "construct artificial message strings", such as Encheferizer, are arranged with respect to the build application. Particularly, Robinson does not show "integrating a pseudo localization process with a build process".

Thus, claim 1 and its dependent claims are patentable over Robinson at least for the above reasons.

Further, for example, claim 5 recites:

 (Original) The method of claim 1, wherein altering the appearance of the locale-dependant code comprises adding at least one prefix character to the locale-dependant code.

The Office Action relied upon Robinson (page 34, Figures 6 and 7: discussing a Japanese preceding string) for the rejection of claim 5. However, Robinson (page 34, Figures 6 and 7: discussing a Japanese preceding string) does not correspond to the limitation recited in claim 5.

Figures 6 and 7 on page 34 and the related description of Robinson illustrate Challenge 4, in which "testers unfamiliar with a language usually cannot see errors that might be obvious to a native speaker of the language." The example of Figures 6 and 7 of Robinson illustrates a corruption error in Japanese which is not immediate apparent to a non-Japanese speaker. Clearly, such an error is not generated by a program to "construct artificial message strings", such as Encheferizer. Thus, Robinson (page 34, Figures 6 and 7: discussing a Japanese preceding string) does not correspond to the limitation recited in claim 5.

Note that claim 5 depend from claim 1, which recites "executing the at least one pseudo localization utility application includes: ... altering an appearance of the locale-dependant code, ..." and claim 5 further recites "altering the appearance of the locale-dependant code comprises adding at least one prefix character to the locale-

<u>dependant code</u>". The change from Figure 6 to Figure 7 of Robinson is not related to "executing the at least one pseudo localization utility application".

The remaining claims depend from at least one of the independent claims discussed above, and therefore include at least some of the distinguishing claim limitations as discussed above. As a result, the remaining claims are also patentable.

CONCLUSION

Applicant respectfully submits that the pending claims are patentable over the cited references. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call at (408) 720-8300.

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, Applicant hereby requests such extension.

Respectfully submitted,

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